

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

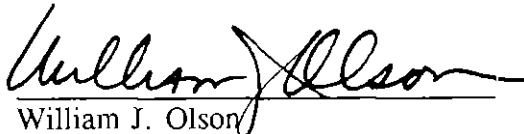
SPECIAL SERVICES FEES AND CLASSIFICATIONS, 1996)

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NASHUA PHOTO, INC. AND MYSTIC COLOR LAB  
FOLLOW-UP INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO UNITED STATES POSTAL SERVICE (NM/USPS 66-72)  
(September 6, 1996)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice,  
Nashua Photo Inc. and Mystic Color Lab hereby submit follow-up interrogatories and  
document production requests. If necessary, please redirect interrogatories and/or requests  
to a more appropriate Postal Service witness.

Respectfully submitted,



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Counsel for Nashua Photo Inc. and  
Mystic Color Lab

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all participants of  
record in this proceeding in accordance with Section 12 of the Rules of Practice.

  
William J. Olson

September 6, 1996

POSTAL RATE COMMISSION  
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**NM/USPS-66.**

The response to NM/USPS-28 and NM/USPS-29 stated that "[t]he Postal Service has not performed studies or surveys since Docket No. R94-1 which have generated data or information which would permit it to respond to these interrogatories." Essentially the same response is given to NM/USPS-36(b). Please answer these interrogatories (NM/USPS-28, 29, and 36(b)) based on all information that is available, at least within Postal Service headquarters, without qualifying your answer to relate only to studies or surveys performed since Docket No. R94-1. Also, as requested in NM/USPS-28, provide data for the most recent year available, even if such year predates Docket No. R94-1.

**NM/USPS-67.**

The response to interrogatory NM/USPS-30 stated that "[t]he Postal Service has not performed an operation survey which would permit it to respond to these interrogatories." Nevertheless, the interrogatory seeks information that would appear to be presently in the possession of the Postal Service, with no need for any kind of survey in order to provide the information sought by the interrogatories.

- a. Is any of the requested information is in the possession of the Postal Service? If so, please provide it.
- b. If this information is not in the possession of the Postal Service, please explain whether any efforts are underway currently which would give the Postal Service

information relevant to the subject of Interrogatory NM/USPS-30 by the time rebuttal testimony is due in this docket (December 6, 1996). If not, when would such information be available?

- c. Please explain whether Postal Service headquarters approves or keeps track of what happens in the field with regarding to BRM.

**NM/USPS-68.**

The response to NM/USPS-31(a)-(c) assumed additional facts relative to the hypothetical posed, but failed to respond to the specific questions continued in parts (a)-(c) of the interrogatory (although purporting to answer them), and did not even purport to answer question (d). Please respond to each of the specific questions contained in NM/USPS-31.

**NM/USPS-69.**

The responses to both NM/USPS-32 and -33 stated that "the Postal Service has not performed a study which has generated data or information which would permit it to respond to this interrogatory." Please state:

- a. Whether the Postal Service has developed any proposals for such a study, or actually commenced such a study, indicating the action taken and the date of any such action;

- b. Will the Postal Service have developed such information by the date that rebuttal testimony is due in this docket (December 6, 1996)? If not, what is the projected date?

**NM/USPS-70.**

- a. Please identify fully all documents provided in response to NM/USPS-34.  
Please identify any and all other similar and underlying documents in the possession of the Postal Service and provide copies with similar redactions.
- b. Please provide USPS Publication 401 as a library reference.

**NM/USPS-71.**

With respect to your responses to NM/USPS-34 and 35, is the Postal Service currently developing further responsive information which would be available by the date on which rebuttal testimony is due (December 6, 1996)? If not, when would such information be available?

**NM/USPS-72.**

The response to NM/USPS 36(c) states " [c]urrent BRM fees and eligibility requirements are based upon the recommendations of the Commission in Docket No. R94-1 and the decision of the Board of Governors to implement those recommendations." The interrogatory, however, asked for an explanation of reasons supporting the eligibility of mail handled

manually for BRMAS automation rates, which is an issue that does not appear to have been addressed previously by the Commission or the Governors. In any event, please explain the reasons which you contend support the eligibility for BRMAS automation rates of mail handled manually, without regard to the Commission's recommendations and the Governors' decision regarding BRM.